

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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KASHMIR GILL,	:
	:
Plaintiff,	: 19-cv-04216 (ILG) (PK)
	:
-v.-	: DECLARATION OF NON-PARTY
	: GOOGLE LLC
JUS BROADCASTING CORP, et al.,	:
	:
Defendants.	:
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I, Molly O’Neil, declare and certify as follows:

1. I am a Policy Specialist at non-party Google LLC (“Google”). I am over 18 years of age and am competent to testify truthfully to the facts asserted herein. The following information is based upon my personal knowledge and is true and accurate to the best of my belief.

2. The Google service at issue in this matter is called Google Workspace (formerly G Suite), through which Google provides custom email services and other productivity and communication products to businesses. I have conducted a search of Google’s database of Workspace accounts and associated account records and content, which shows that the kashmirgill@jusbroadcasting.com account and the contents of emails stored in that account no longer exist in Google’s systems. Google’s records indicate that the account existed in Google’s systems at least as of November 10, 2020. Google’s records do not indicate when or under what circumstances the kashmirgill@jusbroadcasting.com account or any emails stored in that account were deleted subsequent to November 10, 2020, but a Workspace account can only be deleted by an administrator for the applicable domain, which in this case is @jusbroadcasting.com.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on May 11, 2021.

Molly O'Neil  
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